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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

Case No. 19-30088 (DM)

**PG&E CORPORATION**

Chapter 11

**-and-**

(Lead Case)

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

(Jointly Administered)

**Debtors.**

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

*\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)*

**JOINDER OF OFFICIAL COMMITTEE  
OF UNSECURED CREDITORS TO *EX  
PARTE* MOTION OF DEBTORS FOR  
ORDER CONTINUING THE HEARING  
ON THE MOTIONS OF THE OFFICIAL  
COMMITTEE OF TORT CLAIMANTS  
AND THE AD HOC GROUP OF  
SUBROGATION CLAIM HOLDERS FOR  
RELIEF FROM AUTOMATIC STAY**

Related Documents: Dkt. No. 3111

[No hearing requested]

1 The Official Committee of Unsecured Creditors (the “Official Committee”) appointed in  
2 the above-captioned chapter 11 cases, by its attorneys, Milbank LLP, hereby submits this joinder  
3 to the *Ex Parte Motion of Debtors for Order Continuing the Hearing on the Motions of the*  
4 *Official Committee of Tort Claimants and the Ad Hoc Group of Subrogation Claim Holders for*  
5 *Relief from the Automatic Stay* [Docket No. 3111] (the “Motion for Continuance”),<sup>1</sup> and  
6 respectfully states as follows:

7 1. On July 2 and 3, 2019, the TCC and Ad Hoc Subrogation Group filed the Stay  
8 Relief Motions, which seek relief from the automatic stay to request permission for certain  
9 Tubbs wildfire cases to proceed in California Superior Court on the issue of causation [Docket  
10 Nos. 2842, 2863].<sup>2</sup>

11 2. On July 18, 2019, the Debtors filed the Estimation Motion, which contemplates  
12 that a hearing on proposed claims estimation procedures will be held on August 14, 2019.

13 3. As stated in its opposition to the Stay Relief Motions (the “Opposition”) [Docket  
14 No. 3101], the Official Committee believes that a centralized claims estimation proceeding is a  
15 superior alternative to the relief requested in the Stay Relief Motions.

16 4. Following the Official Committee’s filing of its Opposition, the Debtors filed the  
17 Motion for Continuance, seeking to continue the hearing on the Stay Relief Motions until the  
18 August 14 hearing on the Estimation Motion. The Debtors note that the Stay Relief Motions and  
19 the Estimation Motion present “competing proposals” on how to address the issue of “the  
20 Debtors’ liability (if any) for the Tubbs fire.” Motion for Continuance at 6:5-7.

21 5. The Official Committee agrees with the Debtors that resolution of these  
22 “competing proposals” should be addressed together at a single hearing. In order to allow time  
23 for discussion of the appropriate claims estimation procedures in these cases, the Official  
24 Committee joins in the Motion for Continuance.

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27 <sup>1</sup> Capitalized terms not defined herein have the meanings ascribed to them in the Motion for Continuance.

28 <sup>2</sup> The TCC filed an amended form of its motion on July 9, 2019 [Docket No. 2904].

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DATED: July 21, 2019

MILBANK LLP

/s/ Gregory A. Bray  
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SAMUEL A. KHALIL  
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